



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

**JUN 08 2007**

REPLY TO THE ATTENTION OF:

(AE-17J)

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Continental Structural Plastics, Inc.  
755 W. Big Beaver Road, Suite 700  
Troy, Michigan 48084  
Attn: Vinod Shah, Director—Health, Safety and Environmental Affairs

Re: Finding and Notice of Violation at Continental Structural Plastics, Inc., Van Wert, Ohio

Dear Mr. Shah:

This is to advise you that the United States Environmental Protection Agency (U.S. EPA) has determined that Continental Structural Plastics, Inc. (CSP) at 1276 Industrial Drive, Van Wert, Ohio (facility) is in violation of the Clean Air Act (CAA) and associated federal pollution control requirements. A list of the requirements violated is provided in the attached Finding of Violation and Notice of Violation (FOV/NOV). We are today issuing to you an FOV/NOV for these violations.

In summary, the U.S. EPA finds that CSP has violated the organic compound emission limits for each of the three sheet molding compound (SMC) machines at its Van Wert plant. The SMC machines are designated as emission units P001 (SMC Machine #1), P002 (SMC Machine #2), and P009 (SMC Machine #3) in CSP's Title V permit. CSP's CAA Title V permit limits organic compound emissions to 45 pounds per day for each of the SMC machines at the Van Wert plant. Further the U.S. EPA finds that CSP has violated the federally enforceable Ohio State Implementation Plan (Ohio SIP) by employing no control device to control emissions of organic compounds and therefore failing to reduce by 85 percent the emissions of organic compounds from each of the SMC machines at its Van Wert plant.

Emission of volatile organic compounds contributes to the formation of ground-level ozone and smog. Combined, CSP has the capability of emitting approximately 100 tons of volatile organic compounds into the atmosphere from the three SMC machines at its Van Wert plant. Breathing ozone can trigger a variety of health problems including chest pain, coughing, throat irritation, and congestion. It can worsen bronchitis, emphysema, and asthma. Ground-level ozone also can reduce lung function and inflame the linings of the lungs. Repeated exposure may permanently scar lung tissue. Ground-level ozone can have detrimental effects on plants and ecosystems. These effects include: interfering with the ability of sensitive plants to produce and store food, making them more susceptible to certain diseases, insects, other pollutants, competition and harsh weather; damaging the leaves of trees and other plants, negatively impacting the

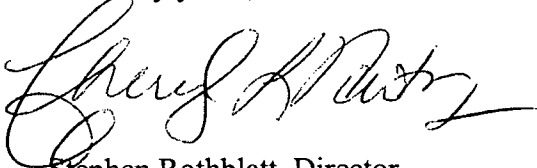
appearance of urban vegetation, national parks, and recreation areas; and reducing crop yields and forest growth, potentially impacting species diversity in ecosystems.

Section 113 of the CAA gives us several enforcement options to resolve these violations, including: issuing an administrative compliance order, issuing an administrative penalty order, bringing a judicial civil action, and bringing a judicial criminal action. The option we select, in part, depends on the efforts taken by CSP to correct the alleged violations and the timeframe in which you can demonstrate and maintain continuous compliance with the requirements cited in the FOV/NOV.

Before we decide which enforcement option is appropriate, Section 113 of the CAA provides you with the opportunity to request a conference with us about the violations alleged in the FOV/NOV. This conference will provide you a chance to present information on the identified violations, any efforts you have taken to comply, and the steps you will take to prevent future violations. Please plan for your facility's technical and management personnel to take part in these discussions. You may have an attorney represent and accompany you at this conference.

The U.S. EPA contacts in this matter are Sheila Desai, Environmental Engineer, and Eaton Weiler, Associate Regional Counsel. You may call them at (312) 353-4150 and (312) 886-6041, respectively, if you wish to request a conference. U.S. EPA hopes that this FOV/NOV will encourage CSP's compliance with the requirements of the Clean Air Act.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Stephen Rothblatt", written in a cursive style.

Stephen Rothblatt, Director  
Air and Radiation Division

Enclosure

cc: Robert Hodanbosi, Chief  
Division of Air Pollution Control  
Ohio Environmental Agency

Mark Budge, APC Manager  
Northwest District Office  
Ohio Environmental Protection Agency

United States Environmental Protection Agency  
Region 5

IN THE MATTER OF:	)	
	)	
Continental Structural Plastics, Inc.	)	FINDING OF VIOLATION and
Van Wert, Ohio	)	NOTICE OF VIOLATION
	)	
Proceedings Pursuant to	)	EPA-5-07-OH-14
the Clean Air Act,	)	
42 U.S.C. §§ 7401 et seq.	)	
	)	

**FINDING AND NOTICE OF VIOLATION**

Continental Structural Plastics, Inc. (you or CSP) owns and operates a fiberglass reinforced composite plastic manufacturing plant at 1276 Industrial Drive, Van Wert, Ohio.

The United States Environmental Protection Agency (U.S. EPA) is sending this Finding of Violation and Notice of Violation (FOV/NOV) to you for violations of CSP's Title V permit and the federally enforceable Ohio State Implementation Plan (SIP). A list and explanation of the violated requirements is provided below. The listed violations constitute violations of the Clean Air Act (CAA).

Section 113 of the CAA provides you with the opportunity to request a conference with us to discuss the violations alleged in the FOV/NOV. This conference will provide you a chance to present information on the identified violations, any efforts you have taken to comply, and the steps you will take to prevent future violations. Please plan for the facility's technical and management personnel to take part in these discussions. You may have an attorney represent and accompany you at this conference.

**Explanation of Violations**

The following factual background, regulatory and permit requirements, and violations are relevant to this FOV/NOV:

Factual Background

1. CSP owns and operates three sheet molding compound (SMC) machines at its Van Wert plant. The SMC machines are designated as emission units P001 (SMC Machine #1), P002 (SMC Machine #2), and P009 (SMC Machine #3) in CSP's Title V permit.
2. Each SMC machine uses liquid organic materials. Each SMC machine employs and applies a photochemically reactive material (i.e., styrene), or substance containing a photochemically reactive material (i.e., styrene) to produce SMC materials.

3. On November 15, 2006, CSP conducted an emissions test on SMC Machine #1. The test measured the emission rate of styrene from SMC Machine #1 using U.S. EPA Reference Test Methods 1, 2, and 4 at 40 C.F.R. Part 60, Appendix A; and Test Methods 204, 204D, 204F, and 205 at 40 C.F.R. Part 51, Appendix M.
4. The emissions test demonstrated a styrene emission rate of 7.58 lbs/hour and an emission factor of 1.2112 pounds styrene per ton of SMC.
5. Each SMC machine has the same capacity, uses the same raw materials, and operates in the same manner.
6. The above cited emission test, combined with production data, demonstrated that each SMC machine (SMC Machine #1, #2, and #3) is, and has been, emitting organic compounds in excess of 45 lbs/day.

#### Title V Permit Violations

7. The Budd Company (CSP's predecessor) was issued a Clean Air Act Title V permit for its Van Wert plant (Permit 03-81-02-0017) on August 28, 2002 (and which expires on August 28, 2007). The Permit limits emissions of organic compounds from each SMC machine to 45 lbs/day.
8. CSP is, and has been, in violation of its Permit by emitting organic compounds in excess of 45 lbs/day from SMC Machine #1.
9. CSP is, and has been, in violation of its Permit by emitting organic compounds in excess of 45 lbs/day from SMC Machine #2.
10. CSP is, and has been, in violation of its Permit by emitting organic compounds in excess of 45 lbs/day from SMC Machine #3.
11. The above cited violations constitute violations of the Clean Air Act.

#### Violations of Ohio SIP Limitations on Photochemically Reactive Compounds

12. The U.S. EPA approved the "Limitations on Photochemically Reactive Compounds" at OAC 3745-21-07 as part of the federally enforceable Ohio SIP on October 31, 1980 (45 Fed. Reg. 72122).
13. The federally enforceable Ohio SIP at 3745-21-07(G)(2), in relevant part, provides:

"A person shall not discharge more than forty pounds of organic material into the atmosphere in any one day . . . from any article, machine, equipment . . . for employing, applying, evaporating or drying any photochemically reactive

material, or substance containing such photochemically reactive material, unless said discharge has been reduced by at least eighty-five per cent."

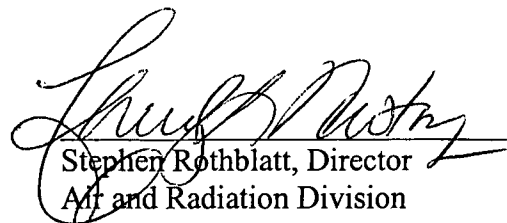
14. As stated above, each SMC machine uses liquid organic materials. Each SMC machine employs and applies a photochemically reactive material (i.e., styrene), or substance containing a photochemically reactive material (i.e., styrene) to produce SMC materials.
15. CSP employs no control device to reduce emissions of photochemically reactive compounds from SMC Machine #1. CSP is, and has been, in violation of the federally enforceable SIP provision OAC 3745-21-07(G)(2) by failing to reduce emissions of organic materials from SMC Machine #1 by at least 85 percent.
16. CSP employs no control device to reduce emissions of photochemically reactive compounds from SMC Machine #2. CSP is, and has been, in violation of the federally enforceable SIP provision OAC 3745-21-07(G)(2) by failing to reduce emissions of organic materials from SMC Machine #2 by at least 85 percent.
17. CSP employs no control device to reduce emissions of photochemically reactive compounds from SMC Machine #3. CSP is, and has been, in violation of the federally enforceable SIP provision OAC 3745-21-07(G)(2) by failing to reduce emissions of organic materials from SMC Machine #3 by at least 85 percent.
18. The above cited violations constitute violations of the Clean Air Act.

### **Environmental Impact of Violations**

Emission of volatile organic compounds contributes to the formation of ground-level ozone and smog. Combined, CSP has the capability of emitting approximately 100 tons of volatile organic compounds into the atmosphere from the three SCM machines at its Van Wert plant. Breathing ozone can trigger a variety of health problems including chest pain, coughing, throat irritation, and congestion. It can worsen bronchitis, emphysema, and asthma. Ground-level ozone also can reduce lung function and inflame the linings of the lungs. Repeated exposure may permanently scar lung tissue. Ground-level ozone can have detrimental effects on plants and ecosystems. These effects include: interfering with the ability of sensitive plants to produce and store food, making them more susceptible to certain diseases, insects, other pollutants, competition and harsh weather; damaging the leaves of trees and other plants, negatively impacting the appearance of urban vegetation, national parks, and recreation areas; and reducing crop yields and forest growth, potentially impacting species diversity in ecosystems.

Date

6/8/07

  
Stephen Rothblatt, Director  
Air and Radiation Division

## CERTIFICATE OF MAILING

I, Loretta Shaffer, certify that I sent a Notice and Finding of Violation, No. EPA-5-07-OH-14, by Certified Mail, Return Receipt Requested, to:

Continental Structural Plastics, Inc.  
755 W. Big Beaver Road, Suite 700  
Troy, Michigan 48084  
Attn: Vinod Shah, Director – Health, Safety and Environmental Affairs

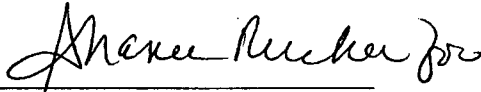
I also certify that I sent copies of the Finding of Violation and Notice of Violation by first class mail to:

Robert Hodanbosi, Chief  
Division of Air Pollution Control  
Ohio Environmental Protection Agency  
Lazarus Government Center  
P.O. 1049  
Columbus, Ohio 43216-1049

and

Mark Budge, APC Manager  
Air Pollution Group  
Northwest District Office  
Ohio Environmental Protection Agency  
347 North Dunbridge Road  
Bowling Green, Ohio 43402

on the 11<sup>th</sup> day of June, 2007.

  
\_\_\_\_\_  
Loretta Shaffer, Secretary  
AECAS, (MN/OH)

CERTIFIED MAIL RECEIPT NUMBER: 7001 0320 0006 0198 9499